

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of)	
)	
Public Service Commission of South Carolina)	NSD File No. L-01-87
Petition for Delegated Authority Pertaining to)	
NXX Code Conservation Measures)	
)	
Implementation of the Local Competition)	CC Docket No. 96-98
Provisions of the Telecommunications Act)	
of 1996)	
)	
Numbering Resource Optimization)	CC Docket No. <u>99-200</u>
)	

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COMMENTS OF THE SOUTH CAROLINA TELEPHONE COALITION

The South Carolina Telephone Coalition (SCTC), an organization of rural telephone companies operating in the State of South Carolina, on behalf of its members as listed in Exhibit A, respectfully submits these comments in the above-captioned action in which the Public Service Commission of South Carolina (PSCSC) seeks additional authority to implement various number conservation measures.

It is the SCTC's understanding that two of the issues raised in the petition – sequential number assignments and reclamation of unactivated or unused numbers – have been addressed and resolved by the Commission and, therefore, those issues are not addressed in these comments.

With respect to the PSCSC's request for authority to order mandatory thousands-block number pooling and NXX code rationing, the SCTC believes such authority is not

Comments of SCTC
NSD File No. L-01-87
CC Docket Nos. 96-98 and 99-200

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needed at this time and, if such authority is granted, implementation of the proposed number conservation measures could have an unintended adverse impact on rural telephone companies and their customers. This would be true even if rural telephone companies are exempted from any number pooling requirements. Even if rural companies are not required to pool their own numbers, the existence of Extended Area Calling (EAS) and Area Calling Plan (ACP) arrangements between companies means that rural companies still would be required to take measures to ensure that company switches recognize thousands-block numbers of those carriers located within the rural telephone company's LATA that have implemented pooling. EAS and ACP arrangements, which in many cases have been ordered by the PSCSC to be implemented by the respective companies, allow rural customers to make local calls into adjoining metropolitan areas on a seven-digit dialed basis. The existence of these EAS and ACP arrangements also means that any implementation of number conservation measures in the Columbia and Charleston/North Charleston MSAs will have an impact on rural telephone companies whose service areas adjoin – but are outside – those MSAs.

In the event the Commission decides to grant the requested delegated authority, the SCTC respectfully urges the Commission and/or the PSCSC to exempt rural telephone companies in South Carolina from any state number pooling requirements. At such time as mandatory nationwide pooling takes effect, rural telephone companies would be subject to the Commission's rules on number pooling, which require participation only by carriers capable of providing local number portability. See 47 C.F.R. § 52.20(b). While SCTC members would still be required to take measures that would enable them to recognize and properly route the numbers of other carriers within

the LATA that are subject to pooling, exempting rural carriers from the requirement to pool their own numbers would reduce the administrative and economic burden associated with implementing number conservation measures for rural carriers.

The SCTC further urges the Commission to require the PSCSC to have a cost recovery mechanism in place that enables both large and small telephone companies to recover the costs associated with implementing or recognizing number conservation measures *before* ordering that such measures be undertaken by the companies. Any such cost recovery mechanism should take into account the fact that many rural carriers in South Carolina have not yet implemented permanent Local Number Portability (LNP). Thus, for example, it may not be appropriate to simply extend existing LNP cost recovery mechanisms to number conservation, because this would not allow many rural telephone companies to adequately recover their costs.

Finally, the SCTC believes that rationing of NXX codes following area code relief may lead to unnecessary delay in obtaining NXX codes, especially in light of the fact that no plan for the administration of code rationing has yet been presented.

In conclusion, the SCTC understands and appreciates the PSCSC's efforts to ensure that adequate numbering resources are available within the State of South Carolina. However, the SCTC believes mandatory thousands-block number pooling and NXX code rationing is not needed at this time. However, if such authority is granted, the SCTC requests that rural telephone companies in South Carolina be exempted from any state number pooling requirements and that implementation of number conservation measures not be undertaken until the PSCSC has an appropriate cost recovery mechanism

in place that will enable companies to recover both the direct costs of number pooling and the costs associated with recognizing pooled numbers of other carriers.

Respectfully Submitted,

/s/ M. John Bowen, Jr.
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June 1, 2001

EXHIBIT A

South Carolina Telephone Coalition Member Companies

Bluffton Telephone Company, Inc.

Chesnee Telephone Company

Chester Telephone Company

Farmers Telephone Cooperative, Inc.

Ft. Mill Telephone Company

Hargray Telephone Company, Inc.

Heath Springs Telephone Company Inc.

Home Telephone Company, Inc.

Horry Telephone Cooperative, Inc.

Lancaster Telephone Company

Lockhart Telephone Company

McClellanville Telephone Company

Norway Telephone Company

Palmetto Rural Telephone Cooperative, Inc.

Piedmont Rural Telephone Cooperative, Inc.

Pond Branch Telephone Company

Ridgeway Telephone Company

Rock Hill Telephone Company

Sandhill Telephone Cooperative, Inc.

St. Stephen Telephone Company

West Carolina Rural Telephone Cooperative, Inc.

Williston Telephone Company

CERTIFICATE OF SERVICE

I, Harriett K. Barrett, hereby certify that on this 1st day of June, 2001, I have caused the foregoing comments of the South Carolina Telephone Coalition to be 1) filed with the FCC via its Electronic Comment Filing System, and 2) served, via First Class United States Mail, postage prepaid, on the following persons:

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/s/ Harriett K. Barrett
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